

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

ADRIAN HOYLE

PLAINTIFF

v.

CIVIL ACTION NO. 3:21-CV-171-NBB-RP

**CITY OF HERNANDO, SCOTT WORSHAM,
in his Official Capacity as Chief of Police of the
Hernando Police Department, OFFICER
LYNN BROWN AND OFFICER HUNTER SOLOMON,
Individually and in their Official Capacities as
Hernando Police Officers, and JOHN DOES 1-25**

DEFENDANTS

JOINDER

COMES NOW, Defendant, Officer Hunter Solomon, in his Individual and Official Capacities, by and through counsel, and files this his Joinder in the following:

Municipal Defendants' Response in Opposition to Plaintiff's Motion to Alter or Amend the Judgment [**Doc. 56**].

This Defendant hereby adopts and incorporates by reference all assertions, arguments, and requests for relief made by the Municipal Defendants, including, but not limited to, the fact that the relief requested by Hoyle is improper, Hoyle's claims are barred in toto by *Heck*, and Hoyle cannot allege a constitutional violation as to either officer after the Fifth Circuit closed the door on claims like Hoyle's in *Salazar v. Molina*, 37 F.4th 278 (5th Cir. 2022).

RESPECTFULLY SUBMITTED this the 3rd day of October, 2023.

JACKS| GRIFFITH| LUCIANO, P.A.

By: /s/ *Bethany A. Tarpley*
Bethany A. Tarpley, MS Bar No. 104134
Daniel J. Griffith, MS Bar No. 8366
Attorneys for Officer Solomon

Of Counsel:

JACKS| GRIFFITH| LUCIANO, P.A.

150 North Sharpe Street

P. O. Box 1209

Cleveland, MS 38732

Phone No. 662-843-6171

FAX No. 662-843-6176

Email: btarpley@jlpalaw.com

dgriffith@jlpalaw.com

CERTIFICATE OF SERVICE

I, Bethany A. Tarpley, attorney of record for Defendant Officer Solomon, do hereby certify that I have this day caused a true and correct copy of the above and foregoing *Joinder to [Doc. 56]* to be delivered by the ECF Filing System which gave notice to the following:

Martin Zummach, Esq.

Sparkman-Zummach, P.C.

Email: martin@sparkman-zummach.com

Attorney for Plaintiff

Murray B. Wells, Esq.

Wells & Associates, PLLC

Email: wells@thewellsfirm.com

Attorney for Plaintiff

G. Todd Butler, Esq.

Mallory K. Bland, Esq.

Phelps Dunbar

Email: Todd.Butler@phelps.com

Mallory.Bland@phelps.com

Attorney for City of Hernando, Scott Worsham, Officer Lynn Brown

DATED this the 3rd day of October, 2022.

/s/ **Bethany A. Tarpley**

Bethany A. Tarpley